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DISTRICT OF NEVADA	
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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

OSCAR CARRANZA,

DEFENDANT.

SUPERSEDING CRIMINAL INDICTMENT

2:10-cr-0532-RLH-GWF

VIOLATIONS:

18 U.S.C. §§ 922(a)(6) and 924(a)(2) -
False Statement During Purchase of a
Firearm

THE GRAND JURY CHARGES THAT:

COUNT ONE

False Statement During the Purchase of a Firearm

On or about April 12, 2010, in the State and Federal District of Nevada,

OSCAR CARRANZA,

defendant herein, in connection with the acquisition of a firearm, to wit: a Bushmaster rifle, caliber .223, model XM15, bearing serial # BF1431279, from Citadel Gun and Safe, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Citadel Gun and Safe, which statement was intended and likely to deceive Citadel Gun and Safe, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18,

1 in that the defendant represented that he was the actual transferee/buyer of the firearm
2 when in fact he was acquiring the firearm on behalf of another person; in violation of Title 18,
3 United States Code, Sections 922(a)(6) and 924(a)(2).

4
5 **COUNT TWO**

6 **False Statement During the Purchase of a Firearm**

7 On or about April 12, 2010, in the State and Federal District of Nevada,

8 **OSCAR CARRANZA,**

9 defendant herein, in connection with the acquisition of a firearm, to wit: a Rock River rifle,
10 caliber .223, model LAR15, bearing serial # KT1020515, from Citadel Gun and Safe, a
11 licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
12 knowingly made a false and fictitious written statement to Citadel Gun and Safe, which
13 statement was intended and likely to deceive Citadel Gun and Safe, as to a fact material to
14 the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18,
15 in that the defendant represented that he was the actual transferee/buyer of the firearm
16 when in fact he was acquiring the firearm on behalf of another person; in violation of Title 18,
17 United States Code, Sections 922(a)(6) and 924(a)(2).

18 **COUNT THREE**

19 **False Statement During the Purchase of a Firearm**

20 On or about May 16, 2010, in the State and Federal District of Nevada,

21 **OSCAR CARRANZA,**

22 defendant herein, in connection with the acquisition of a firearm, to wit: a Stag rifle, caliber
23 .556, model Stag 15, bearing serial # 108490, from The Gun Store, a licensed dealer of
24 firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made
25 a false and fictitious written statement to The Gun Store, which statement was intended and
26 likely to deceive The Gun Store, as to a fact material to the lawfulness of such sale of the
said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented

1 that he was the actual transferee/buyer of the firearm when in fact he was acquiring the
2 firearm on behalf of another person; in violation of Title 18, United States Code, Sections
3 922(a)(6) and 924(a)(2).

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5 **COUNT FOUR**

6 **False Statement During the Purchase of a Firearm**

7 On or about May 16, 2010, in the State and Federal District of Nevada,

8 **OSCAR CARRANZA,**

9 defendant herein, in connection with the acquisition of a firearm, to wit: a CAI rifle, caliber
10 .556, model Golani Sporter, bearing serial # GLN06838, from The Gun Store, a licensed
11 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly
12 made a false and fictitious written statement to The Gun Store, which statement was
13 intended and likely to deceive The Gun Store, as to a fact material to the lawfulness of such
14 sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant
15 represented that he was the actual transferee/buyer of the firearm when in fact he was
16 acquiring the firearm on behalf of another person; in violation of Title 18, United States Code,
17 Sections 922(a)(6) and 924(a)(2).

18 **COUNT FIVE**

19 **False Statement During the Purchase of a Firearm**

20 On or about May 16, 2010, in the State and Federal District of Nevada,

21 **OSCAR CARRANZA,**

22 defendant herein, in connection with the acquisition of a firearm, to wit: a CAI rifle, caliber
23 7.62x39, model GP1975, bearing serial # GP7508112, from The Gun Store, a licensed
24 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly
25 made a false and fictitious written statement to The Gun Store, which statement was
26 intended and likely to deceive The Gun Store, as to a fact material to the lawfulness of such
sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant

1 represented that he was the actual transferee/buyer of the firearm when in fact he was
2 acquiring the firearm on behalf of another person; in violation of Title 18, United States Code,
3 Sections 922(a)(6) and 924(a)(2).

4
5 **COUNT SIX**

6 **False Statement During the Purchase of a Firearm**

7 **On or about May 16, 2010, in the State and Federal District of Nevada,**

8 **OSCAR CARRANZA,**

9 defendant herein, in connection with the acquisition of a firearm, to wit: a CAI rifle, caliber
10 7.62x39, model GP1975, bearing serial # GP7508066, from The Gun Store, a licensed
11 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly
12 made a false and fictitious written statement to The Gun Store, which statement was
13 intended and likely to deceive The Gun Store, as to a fact material to the lawfulness of such
14 sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant
15 represented that he was the actual transferee/buyer of the firearm when in fact he was
16 acquiring the firearm on behalf of another person; in violation of Title 18, United States Code,
17 Sections 922(a)(6) and 924(a)(2).

18 **COUNT SEVEN**

19 **False Statement During the Purchase of a Firearm**

20 **On or about May 16, 2010, in the State and Federal District of Nevada,**

21 **OSCAR CARRANZA,**

22 defendant herein, in connection with the acquisition of a firearm, to wit: a CAI rifle, caliber
23 7.62x54, model PSL-54C, bearing serial # C-909975, from The Gun Store, a licensed dealer
24 of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made
25 a false and fictitious written statement to The Gun Store, which statement was intended and
26 likely to deceive The Gun Store, as to a fact material to the lawfulness of such sale of the
said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented

1 that he was the actual transferee/buyer of the firearm when in fact he was acquiring the
2 firearm on behalf of another person; in violation of Title 18, United States Code, Sections
3 922(a)(6) and 924(a)(2).

4
5 **COUNT EIGHT**

6 **False Statement During the Purchase of a Firearm**

7 On or about May 16, 2010, in the State and Federal District of Nevada,

8 **OSCAR CARRANZA,**

9 defendant herein, in connection with the acquisition of a firearm, to wit: a CAI rifle, caliber
10 7.62x39, model WASR 10/63 bearing serial # 1972EG-4355, from The Gun Store, a licensed
11 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly
12 made a false and fictitious written statement to The Gun Store, which statement was
13 intended and likely to deceive The Gun Store, as to a fact material to the lawfulness of such
14 sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant
15 represented that he was the actual transferee/buyer of the firearm when in fact he was
16 acquiring the firearm on behalf of another person; in violation of Title 18, United States Code,
17 Sections 922(a)(6) and 924(a)(2).

18 **COUNT NINE**

19 **False Statement During the Purchase of a Firearm**

20 On or about May 16, 2010, in the State and Federal District of Nevada,

21 **OSCAR CARRANZA,**

22 defendant herein, in connection with the acquisition of a firearm, to wit: a Colt rifle, caliber
23 .223, model Sporter Match, bearing serial # MH037686, from The Gun Store, a licensed
24 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly
25 made a false and fictitious written statement to The Gun Store, which statement was
26 intended and likely to deceive The Gun Store, as to a fact material to the lawfulness of such
sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant

1 represented that he was the actual transferee/buyer of the firearm when in fact he was
2 acquiring the firearm on behalf of another person; in violation of Title 18, United States Code,
3 Sections 922(a)(6) and 924(a)(2).

4
5 **COUNT TEN**

6 **False Statement During the Purchase of a Firearm**

7 **On or about May 16, 2010, in the State and Federal District of Nevada,**

8 **OSCAR CARRANZA,**

9 defendant herein, in connection with the acquisition of a firearm, to wit: a Norinco rifle,
10 caliber 7.62x39, model MAK-90, bearing serial # 9490498, from The Gun Store, a licensed
11 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly
12 made a false and fictitious written statement to The Gun Store, which statement was
13 intended and likely to deceive The Gun Store, as to a fact material to the lawfulness of such
14 sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant
15 represented that he was the actual transferee/buyer of the firearm when in fact he was
16 acquiring the firearm on behalf of another person; in violation of Title 18, United States Code,
17 Sections 922(a)(6) and 924(a)(2).

18 **COUNT ELEVEN**

19 **False Statement During the Purchase of a Firearm**

20 **On or about May 17, 2010, in the State and Federal District of Nevada,**

21 **OSCAR CARRANZA,**

22 defendant herein, in connection with the acquisition of a firearm, to wit: a CAI rifle, caliber
23 7.62x39, model M70AB2, bearing serial # M70AB23508, from Discount Firearms, a licensed
24 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly
25 made a false and fictitious written statement to Discount Firearms, which statement was
26 intended and likely to deceive Discount Firearms, as to a fact material to the lawfulness of
such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the

1 defendant represented that he was the actual transferee/buyer of the firearm when in fact
2 he was acquiring the firearm on behalf of another person; in violation of Title 18, United
3 States Code, Sections 922(a)(6) and 924(a)(2).

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5 **COUNT TWELVE**

6 **False Statement During the Purchase of a Firearm**

7 On or about May 17, 2010, in the State and Federal District of Nevada,

8 **OSCAR CARRANZA,**

9 defendant herein, in connection with the acquisition of a firearm, to wit: a Bushmaster rifle,
10 caliber 5.56, model XM15-E25, bearing serial # L296159, from Discount Firearms, a licensed
11 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly
12 made a false and fictitious written statement to Discount Firearms, which statement was
13 intended and likely to deceive Discount Firearms, as to a fact material to the lawfulness of
14 such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the
15 defendant represented that he was the actual transferee/buyer of the firearm when in fact
16 he was acquiring the firearm on behalf of another person; in violation of Title 18, United
17 States Code, Sections 922(a)(6) and 924(a)(2).

18 **COUNT THIRTEEN**

19 **False Statement During the Purchase of a Firearm**

20 On or about May 22, 2010, in the State and Federal District of Nevada,

21 **OSCAR CARRANZA,**

22 defendant herein, in connection with the acquisition of a firearm, to wit: a DPMS rifle, caliber
23 5.56, model A-15 bearing serial #F184508, from the Las Vegas Gun Range and Firearms
24 Center, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United
25 States Code, knowingly made a false and fictitious written statement to the Las Vegas Gun
26 Range and Firearms Center, which statement was intended and likely to deceive the Las
Vegas Gun Range and Firearms Center, as to a fact material to the lawfulness of such sale

1 of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant
2 represented that he was the actual transferee/buyer of the firearm when in fact he was
3 acquiring the firearm on behalf of another person; in violation of Title 18, United States Code,
4 Sections 922(a)(6) and 924(a)(2).

5
6 **COUNT FOURTEEN**

7 **False Statement During the Purchase of a Firearm**

8 On or about May 22, 2010, in the State and Federal District of Nevada,

9 **OSCAR CARRANZA,**

10 defendant herein, in connection with the acquisition of a firearm, to wit: a Century Arms rifle,
11 caliber 7.62, model M70AB2T bearing serial # AB2T-N102529, from the Las Vegas Gun
12 Range and Firearms Center, a licensed dealer of firearms within the meaning of Chapter 44,
13 Title 18, United States Code, knowingly made a false and fictitious written statement to the
14 Las Vegas Gun Range and Firearms Center, which statement was intended and likely to
15 deceive the Las Vegas Gun Range and Firearms Center, as to a fact material to the
16 lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in
17 that the defendant represented that he was the actual transferee/buyer of the firearm when
18 in fact he was acquiring the firearm on behalf of another person; in violation of Title 18,
United States Code, Sections 922(a)(6) and 924(a)(2).

19
20 **COUNT FIFTEEN**

21 **False Statement During the Purchase of a Firearm**

22 On or about May 22, 2010, in the State and Federal District of Nevada,

23 **OSCAR CARRANZA,**

24 defendant herein, in connection with the acquisition of a firearm, to wit: a Romarm Cugir rifle,
25 caliber 7.62, model WASR 10/63 bearing serial # 1983-AG4078, from the Las Vegas Gun
26 Range and Firearms Center, a licensed dealer of firearms within the meaning of Chapter 44,
Title 18, United States Code, knowingly made a false and fictitious written statement to the

1 Las Vegas Gun Range and Firearms Center, which statement was intended and likely to
2 deceive the Las Vegas Gun Range and Firearms Center, as to a fact material to the
3 lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in
4 that the defendant represented that he was the actual transferee/buyer of the firearm when
5 in fact he was acquiring the firearm on behalf of another person; in violation of Title 18,
6 United States Code, Sections 922(a)(6) and 924(a)(2).

7 DATED: this 21st day of February, 2012.

8 A TRUE BILL:

9
10 /s/
FOREPERSON OF THE GRAND JURY

11 DANIEL G. BOGDEN
12 United States Attorney

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14 BRADLEY W. GILES
15 Assistant United States Attorney
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